Managing Decision Uncertainty Using the Triad Approach

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USEPA Technology Innovation Office

- Advocates for better technologies and strategies to clean up contaminated sites:
 - Site investigation/characterization
 - Site remediation
 - Monitoring during or after remedial action
- Acts as an agent for change
 - Disseminates others' good ideas
- Cleanup Information Website: http://cluin.org

Take-Home Message # 1

Using SOUND SCIENCE

when evaluating contaminated sites means that the the scale of data generation and interpretation must closely "match" the scale of project decisions being based on that data.

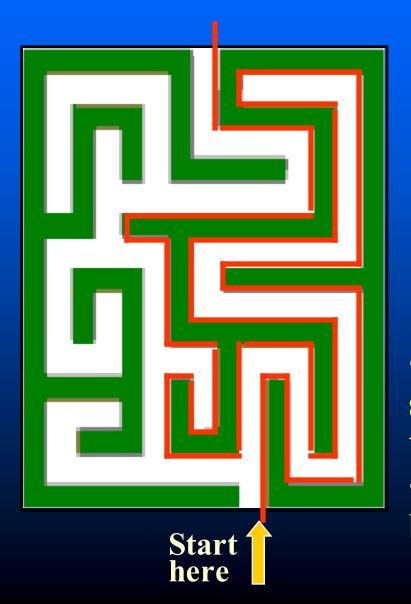
"Sound science" also requires managing uncertainty, since an exact match usually is not feasible.

Take-Home Message # 2

- The Triad Approach seeks to institutionalize uncertainty management through holistic integration of innovative data generation and interpretation tools
- Triad Approach = Integrates systematic project planning, a dynamic work plan strategy, and realtime analysis as applied to wastes and contaminated sites to \$\forall\$ time & costs and \$\forall\$ decision certainty
- Theme for the Triad Approach = Explicitly identify and manage the largest sources of decision error, especially the sampling representativeness of data

Characterization & Cleanup Strategy: Where We've Been

The Past: A Process-Driven Approach



Mandate to Superfund Program
Create program to cleanup up
sites with little experience, tools,
or knowledge to do so!

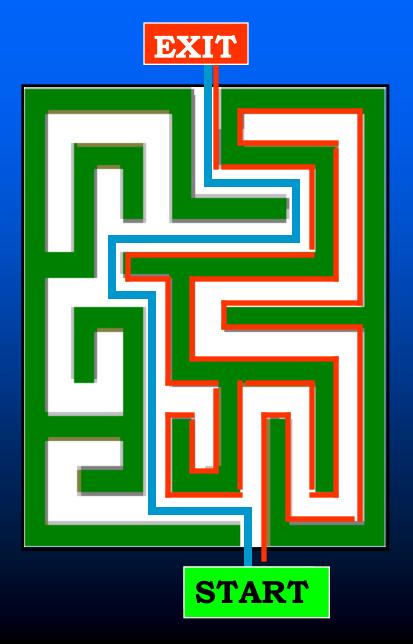
Similar to finding one's way through a maze when the exit is not marked

- Solution to both: Use a rote onesize-fits-all process to get through the maze to the exit.
- Caveat: You cannot expect it to be a resource-efficient trip.



Characterization & Cleanup Strategy: Where We Are Heading

The Future: Toward a Better Strategy



Proven Effective:

- Project planning (vs. process)
- Multidisciplinary team
- Stakeholders involved
- Create opportunities for real-time decision-making to save time and \$\$
- Real-time decisions need real-time data & uncertainty mgt
- Project-specific CSM to plot resource-effective course

A Systems Approach Framework The Triad Approach

Systematic Project Planning



Dynamic
Work Plan
Strategy

Real-time Measurement Technologies

Unifying Concept for Triad: Managing Uncertainty

Systematic planning is used to proactively...

- Manage uncertainty about project goals
 - Identify decision goals with tolerable overall uncertainty
 - Identify major uncertainties (cause decision error)
 - Identify the strategies to manage each major uncertainty
- Manage uncertainty in data
 - Sampling uncertainty: manage sample representativeness
 - Analytical uncertainty: especially if field methods are used
- Multidisciplinary expertise critical
 - A TEAM is the best way to bring needed knowledge to bear

Dynamic Work Plan Strategy

- Real-time decision-making "in the field"
 - Evolve CSM in real-time
 - Implement pre-approved decision tree using senior staff
 - Contingency planning: most seamless activity flow possible to reach project goals in fewest mobilizations
- Real-time decisions need real-time data
 - Use off-site lab w/ short turnaround?
 - » Use screening analytical methods in fixed lab?
 - Use on-site analysis?
 - » Use mobile lab with conventional equipment?
 - » Use portable kits & instruments?

Mix And Match

In all cases, must generate data of known quality

Generating Real-time Data Using Field Methods Manage Uncertainty through Systematic Planning

- Need clearly defined data uses—tie to project goals
- Understand dynamic work plan—branch points & work flow
- Project-specific QA/QC protocols matched to intended data use
- Select field analytical technologies to
 - Support the dynamic work plan (greatest source of \$\$ savings)
 - Manage sampling uncertainty (improves decision quality)
- Select fixed lab methods (as needed) to
 - Manage uncertainties in field data (just ONE aspect of QC for field data)
 - Supply analyte-specific data and/or lower quantitation limits
 (as needed for regulatory compliance, risk assessment, etc.)

Updating the Data Quality Concept as a Tool to Achieve Decision Quality

Data is Generated on Samples

Perfect Analytical Chemistry



Non-Representative Sample

"BAD" DATA

Distinguish:

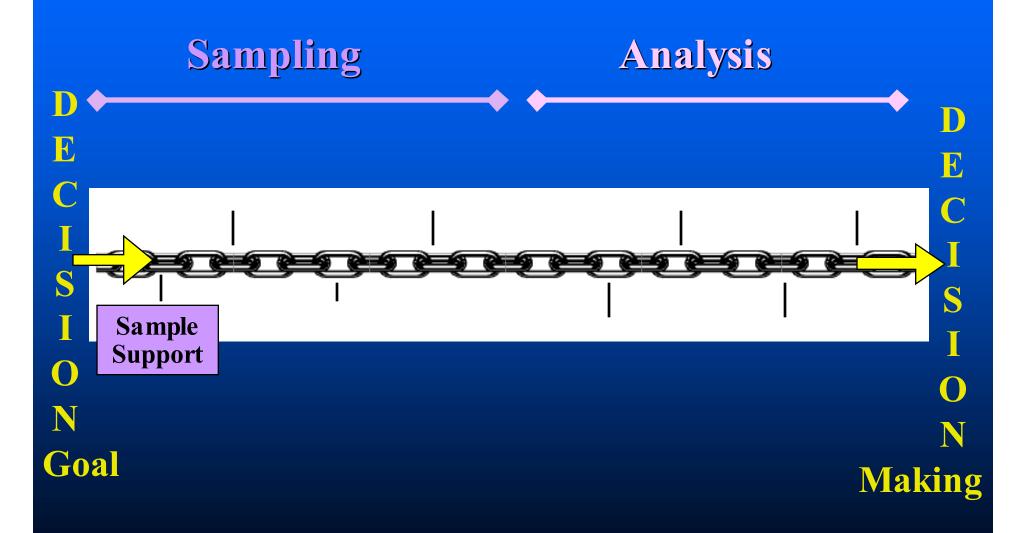
Analytical Quality from Data Quality

What is "Data Quality"?

Data Quality = The ability of data to provide information that meets user needs

- Users need to make correct decisions
- Data quality is a function of data's...
 - ability to represent the "true state" in the context of the decision to be made
 - » The decision defines the scale for the "true state"
 - information content (including its uncertainty)

The Data Quality "Chain"



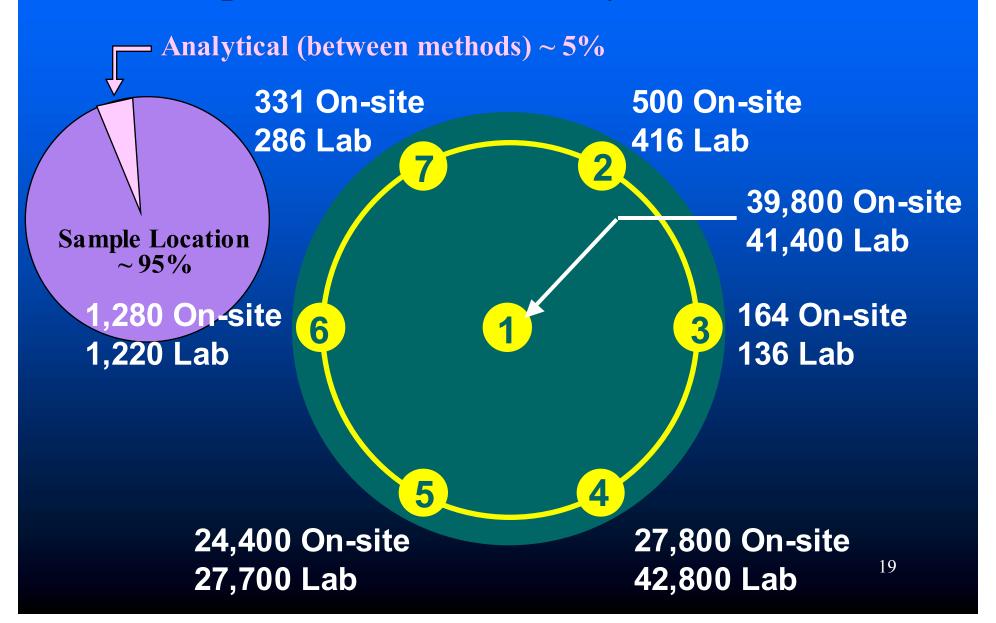
Sample Support: Critical to Representativeness

Sample Volume & Orientation

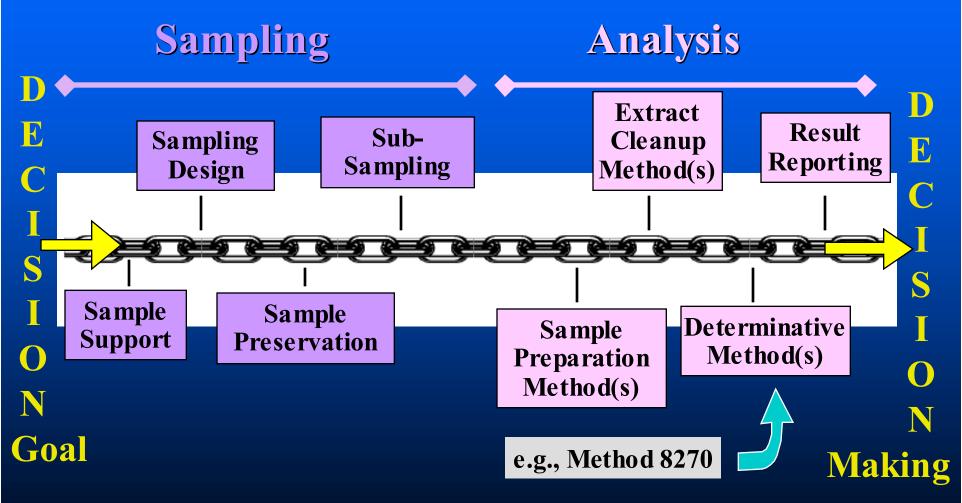
#1 #2 #3

The decision driving sample collection:
Assess contamination resulting from atmospheric deposition

Example of Variability: Sample Location vs. Analytical Method



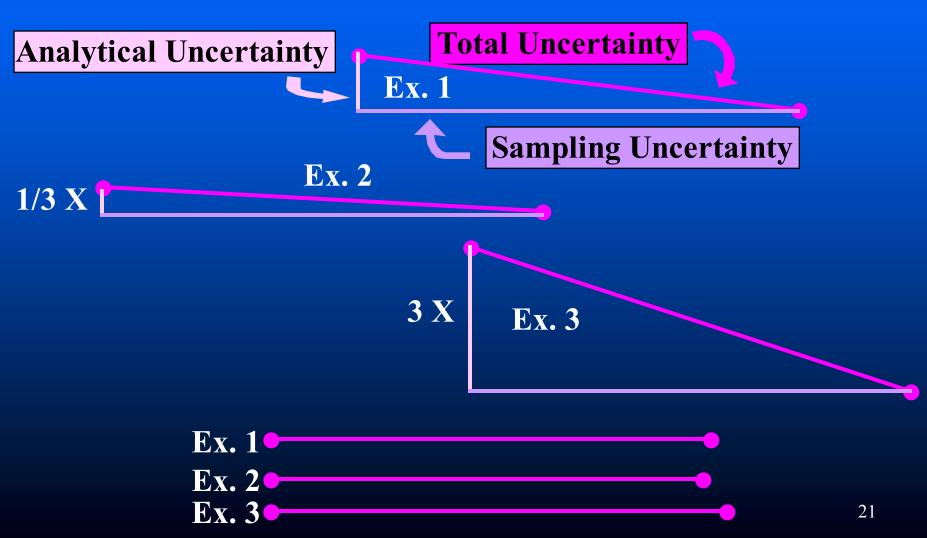
The Data Quality "Chain"

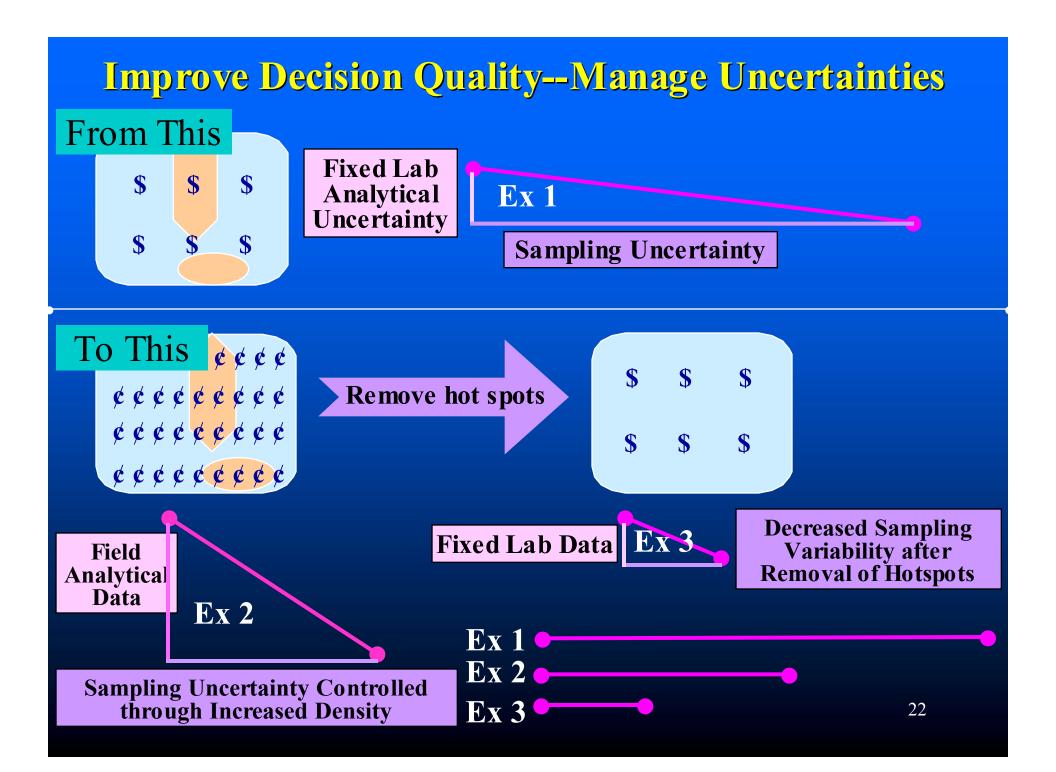


All links in the Data Quality chain must be intact for Decision Quality to be supported!

Summing Uncertainties

Uncertainties add according to $(a^2 + b^2 = c^2)$





Partitioning Data Uncertainty



Example: Brownfields Project (Scrap Yard Site)

Std Dev Sampling: Std Dev Analytical = Samp: Anal Ratio

Using LCS data	As Pb	22.4:7 = 3:1 3255:3 = 1085:1
Using LCS data Using MS/MSD data	B(a)P	6,520: 4.4 = 1464:1 6,520:12.7 = 513:1

Marrying Analytical Methods to Make Sound Decisions Involving Heterogeneous Matrices

Costly definitive analytical methods

Low DL + analyte specificity

Manages analytical uncertainty

- = analytical representativeness
- = analytical quality

Definitive analytical quality Screening sampling quality **Cheaper/screening** analytical methods

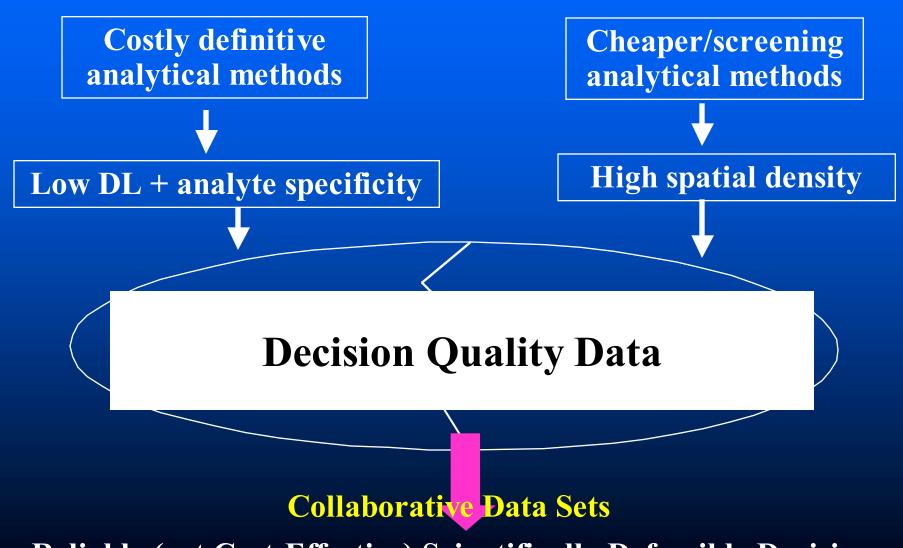
High spatial density

Manages sampling uncertainty

- = sampling representativeness
- = sampling quality

Definitive sampling quality Screening analytical quality

Marrying Analytical Methods to Make Sound Decisions Involving Heterogeneous Matrices



Reliable (yet Cost-Effective) Scientifically Defensible Decisions

Sample Representativeness is Key!

Finally able to address defensibly and affordably!

- Cheaper analyses permit increased sample density
 - New software for statistical/geostatistical decision support
 - » VSP software pkg FREE: http://dqo.pnl.gov/VSP/index.htm
 - » SADA software pkg FREE: http://www.tiem.utk.edu/~sada/
 - » FIELDS/SADA software: http://www.epa.gov/region5fields/static/pages/index.html
- Real-time measurements support real-time decisionmaking
 - Rapid feedback for course correction → smarter sampling
- Data Quality: Focus on overall data uncertainty; analytical uncertainty usually a small fraction

Case Study: Wenatchee Tree Fruit Site

Pesticide IA kits guide dynamic work plan: remove and segregate contaminated soil for disposal

230 IA analyses (w/ thorough QC) + 29 fixed-lab samples for 33 analytes

Managed sampling uncertainty: achieved very high confidence that all contamination above action levels was located and removed

Managed field analytical uncertainty as additional QC on critical samples: confirmed & perfected field kit action levels)

- Clean closure data set
 - 33 fixed lab samples for analyte-specific pesticide analysis
 - Demonstrate <u>full</u> compliance with <u>all</u> regulatory requirements for <u>all</u> 33 pesticide analytes to >95% statistical confidence <u>the first time!</u>
- Projected cost: ~\$1.2M; Actual: \$589K (Save ~ 50%)
- Field work completed: <4 months; single mobilization

Terminology to Integrate Data Quality into Decision Quality

"Data Quality" Terminology

Current terminology usage does not focus on the goal of decision quality

- Irony: Great focus on the quality of data <u>points</u>; but overall quality of <u>decisions</u> easily unknown.
- Current usage does not distinguish
 - Methods vs. data vs. decisions
 - The factors that impact each step in the process
 - Relationships between different aspects of quality

Misleading Terminology



This term & an oversimplified data quality model falsely implies that:

- All methods run in the field are screening methods.
- Therefore, all data produced in the field are of screening quality.
- Fixed labs using definitive analytical methods don't produce screening quality data.
- Fixed labs don't use screening methods.

"Effective Data" "Decision Quality Data"

Data of known quality that can be logically demonstrated to be effective for making the specified decision because both the sampling and analytical uncertainties are managed to the degree necessary to meet clearly defined (and stated) decision confidence goals

Proposed Clarification of Terms Quality Assurance

- Project QA: ID causes of potential intolerable decision errors
 & the strategies to manage and prevent those decision errors
- Data QA: manage both sampling and analytical uncertainties to degree needed to avoid decision errors
 - Analytical representativeness evaluated, including impact of sample/matrix effects on analytical performance
 - Sample representativeness evaluated
- Lab QA: manage technical performance of analytical instruments, processes, and operators to meet lab quality goals
 - Sample/matrix effects on analytical performance may or may not be evaluated—depends on contract specifications.

Proposed Clarification of Terms Data Quality

- Decision quality data* = Effective data* = data shown to be effective for decision-making
- Screening quality data* = some useful information provided; but too uncertain to support decision-making alone
- Collaborative data sets = distinct data sets used in concert with each other to co-manage sampling and/or analytical uncertainties to an acceptable level

^{*} Includes sampling uncertainty. Nature of method irrelevant.

Transitioning to a More Modern Approach

Transition Steps

- Articulate an overall vision and strategy to modernize site cleanup activities and programs
 - View Triad pilot projects as <u>both</u> teaching and learning tools:
 perfect scientific best practice 1st, <u>then</u> write technical guidance
- Revise and clarify the data quality model to match current scientific understanding
 - Use intuitive terminology that avoids misconceptions, and that clarifies (rather than obscures) critical concepts
 - Conceptually link data quality to managing decision uncertainty
 - Retool common phrasing. Example: "Define the nature and extent of contamination at the scale of decision-making"
- Educate about uncertainty management (decisions & data)
- Explicitly support multi-disciplinary project teams

TIO Efforts to Provide Support

- Outreach—published articles (reprints available on Clu-In)
 - Environmental Testing & Analysis article (Jan 2001)
 - ES&T feature article (Oct 2001)
- "PM's Handbook of Triad Best Practices" (in development—pilot draft Web-available Aug 1, 2002)
 - Hyper-linked Internet-based "how-to" map to existing guidance and technical information that support Triad implementation
 - The "Handbook" is designed to evolve and incorporate new ideas as practitioner and programmatic experience grows
- Partnering with other experts/organizations:
 - US Army Corps of Engineers (Handbook partner)
 - Argonne National Lab (technical support and practitioner expert)
- Internet seminars: http://cluin.org/studio/seminar.cfm
 - Archived or live

The Diffusion of Innovation

"At first people refuse to believe that a strange new thing can be done, then they begin to hope it can be done—then it is done and all the world wonders why it was not done centuries ago."

—Francis Hodges Burnett